Alabama Department of Environmental Management

MAJOR SOURCE OPERATING PERMIT

Permittee: **Tennessee Alloys Company**

Facility Name: **Tennessee Alloys Company**

Facility No.: 705-0007

Location: Bridgeport, Alabama

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code §§22-28-1 to 22-28-23 (1997 Rplc. Vol. and 2006 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code §§22-22A-1 to 22-22A-15 (1997 Rplc. Vol. and 2006 Cum. Supp.), and ADEM Admin. Code R.s and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: *Draft*

Expiration Date: *Draft*

Alabama Department of Environmental Management

TABLE OF CONTENTS

General Permit Provisos

Federally Enforceable Provisos	Regulations
1. Transfer	
This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in ADEM Admin. Code R. 335-3-16-.13(1)(a)5.	ADEM Admin. Code R. 335-3-16-.02(6)
2. Renewals	
An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.	ADEM Admin. Code R. 335-3-16-.12(2)
The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	
3. Severability Clause	
The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivision, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	ADEM Admin. Code R. 335-3-16-.05(e)
4. Compliance	
(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	ADEM Admin. Code R. 335-3-16-.05(f)
(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	ADEM Admin. Code R. 335-3-16-.05(g)

General Permit Provisos

Federally Enforceable Provisos	Regulations
5. Termination for Cause	
This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	ADEM Admin. Code R. 335-3-16-.05(h)
6. Property Rights	
The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	ADEM Admin. Code R. 335-3-16-.05(i)
7. Submission of Information	
The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	ADEM Admin. Code R. 335-3-16-.05(j)
8. Economic Incentives, Marketable Permits, and Emissions Trading	
No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	ADEM Admin. Code R. 335-3-16-.05(k)
9. Certification of Truth, Accuracy, and Completeness:	
Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.	ADEM Admin. Code R. 335-3-16-.07(a)
10. Inspection and Entry	
Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized representatives of the Alabama Department of Environmental Management and EPA to conduct the following:	ADEM Admin. Code R. 335-3-16-.07(b)
(a) Enter upon the permittee's premises where a source	

Federally Enforceable Provisos	Regulations
is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit; (b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit; (c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit; (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.	
11. <u>Compliance Provisions</u>	
(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	ADEM Admin. Code R. 335-3-16-.07(c)
(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.	
12. <u>Compliance Certification</u>	
A compliance certification shall be submitted on or before **August 17th** of each calendar year and shall cover the period between June 18th of the previous year and June 17th of the current year.	ADEM Admin. Code R. 335-3-16-.07(e)
(a) The compliance certification shall include the following: (1) The identification of each term or condition of this permit that is the basis of the certification; (2) The compliance status; (3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with ADEM Admin. Code R. 335-3-16-.05(c) (Monitoring and Recordkeeping Requirements); (4) Whether compliance has been continuous or intermittent; (5) Such other facts as the Department may require to determine the compliance status of the source;	

Federally Enforceable Provisos	Regulations
(b) The compliance certification shall be submitted to: Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to: Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303	
13. <u>Reopening for Cause</u>	
Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit: (a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire. (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit. (c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.	ADEM Admin. Code R. 335-3-16-.13(5)
14. <u>Additional ADEM Admin. Code R.s and Regulations</u>	
This permit is issued on the basis of ADEM Admin. Code R.s and Regulations existing on the date of issuance. In the event additional ADEM Admin. Code R.s and Regulations are adopted, it shall be the permit holder's responsibility to comply with such ADEM Admin. Code R.s.	§22-28-16(d), Code of Alabama 1975, as amended

General Permit Provisos

Federally Enforceable Provisos	Regulations
15. <u>Equipment Maintenance or Breakdown</u>	
(a) In the case of shutdown of air pollution control equipment (which operates pursuant to any permit issued by the Director) for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Director at least twenty-four (24) hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. Such prior notice shall include, but is not limited to the following:	ADEM Admin. Code R. 335-3-1-.07(1), (2)
(1) Identification of the specific facility to be taken out of service as well as its location and permit number;	
(2) The expected length of time that the air pollution control equipment will be out of service;	
(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;	
(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;	
(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.	
(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director shall be notified when the breakdown has been corrected.	
16. <u>Operation of Capture and Control Devices</u>	
All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.	§22-28-16(d), Code of Alabama 1975, as amended

General Permit Provisos

Federally Enforceable Provisos	Regulations
17. Obnoxious Odors	
This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.	ADEM Admin. Code R. 335-3-1-.08
18. Fugitive Dust	
(a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc.	ADEM Admin. Code R. 335-3-4-.02
(b) Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne. A minimum of one, or a combination, of the following methods shall be utilized to minimize airborne dust from plant or haul roads and grounds: (1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic; (2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created; (3) By paving; (4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions;	
Should one, or a combination, of the above methods fail to adequately reduce airborne dust from plant or haul roads and grounds, alternative methods shall be employed, either exclusively or in combination with one or all of the above control techniques, so that dust will not become airborne. Alternative methods shall be approved by the Department prior to utilization.	
19. Additions and Revisions	
Any modifications to this source shall comply with the modification procedures in ADEM Admin. Code R.s 335-3-16-.13 or 335-3-16-.14.	ADEM Admin. Code R. 335-3-16-.13 and .14

General Permit Provisos

Federally Enforceable Provisos	Regulations
20. Recordkeeping Requirements	
(a) Records of required monitoring information of the source shall include the following: (1) The date, place, and time of all sampling or measurements; (2) The date analyses were performed; (3) The company or entity that performed the analyses; (4) The analytical techniques or methods used; (5) The results of all analyses; and (6) The operating conditions that existed at the time of sampling or measurement.	ADEM Admin. Code R. 335-3-16-.05(c)2.
(b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.	
21. Reporting Requirements	
(a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with ADEM Admin. Code R. 335-3-16-.04(9).	ADEM Admin. Code R. 335-3-16-.05(c)3.
(b) Deviations from permit requirements shall be reported within 48 hours or 2 working day of such deviations, including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	

General Permit Provisos

Federally Enforceable Provisos	Regulations
22. <u>Emission Testing Requirements</u>	
Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.	ADEM Admin. Code R. 335-3-1-.05(3) and ADEM Admin. Code R. 335-3-1-.04(1)
The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control ADEM Admin. Code R.s and regulations.	
To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:	
(1) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.	ADEM Admin. Code R. 335-3-1-.04
(2) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures require probe cleaning).	
(3) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.	
(4) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.	
A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.	ADEM Admin. Code R. 335-3-1-.04
All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.	

General Permit Provisos

Federally Enforceable Provisos	Regulations
23. Payment of Emission Fees	
Annual emission fees shall be remitted each year according to the fee schedule in ADEM Admin. Code R. 335-1-7-.04.	ADEM Admin. Code R. 335-1-7-.04
24. Other Reporting and Testing Requirements	
Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control ADEM Admin. Code R.s and regulations. The Department may require emission testing at any time.	ADEM Admin. Code R. 335-3-1-.04(1)
25. Title VI Requirements (Refrigerants)	
Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F. No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F. The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.	40 CFR 82
26. Chemical Accidental Prevention Provisions	
If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then: (a) The owner or operator shall comply with the provisions in 40 CFR Part 68. (b) The owner or operator shall submit one of the following: (1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or, (2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	40 CFR Part 68

General Permit Provisos

Federally Enforceable Provisos	Regulations
27. Display of Permit	
This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will be made readily available for inspection by any or all persons who may request to see it.	ADEM Admin. Code R. 335-3-14-.01(1)(d)
28. Circumvention	
No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 ADEM Admin. Code R.s and regulations.	ADEM Admin. Code R. 335-3-1-.10
29. Visible Emissions	
Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.	ADEM Admin. Code R. 335-3-4-.01(1)
30. Fuel-Burning Equipment	
(a) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.	ADEM Admin. Code R. 335-3-4-.03
(b) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.	ADEM Admin. Code R. 335-3-5-.01
31. Process Industries – General	
Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.04.	ADEM Admin. Code R. 335-3-4-.04
32. Averaging Time for Emission Limits	
Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.	ADEM Admin. Code R. 335-3-1-.05

Federally Enforceable Provisos	Regulations
33. <u>Compliance Assurance Monitoring (CAM)</u>	40 CFR 64
Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.	
(a) Operation of Approved Monitoring	40 CFR 64.7
(1) *Commencement of operation*. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).	
(2) *Proper maintenance*. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.	
(3) *Continued operation*. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.	
(4) *Response to excursions or exceedances*. (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control	

Federally Enforceable Provisos	Regulations
practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.	
(5) *Documentation of need for improved monitoring*. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.	
(b) Quality Improvement Plan (QIP) Requirements	40 CFR 64.8
(1) Based on the results of a determination made under Section 33(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a	

Federally Enforceable Provisos	Regulations
higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices. (2) Elements of a QIP: (a) The owner or operator shall maintain a written QIP, if required, and have it available for inspection. (b) The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate: i. Improved preventive maintenance practices. ii. Process operation changes. iii. Appropriate improvements to control methods. iv. Other steps appropriate to correct control performance. v. More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above). (3) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined. (4) Following implementation of a QIP, upon any subsequent determination pursuant to Section 33(a)(4)(b) above, the Department may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have: (a) Failed to address the cause of the control device performance problems; or (b) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for	

Federally Enforceable Provisos	Regulations
minimizing emissions.	
(5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.	
(c) Reporting and Recordkeeping Requirements	40 CFR 64.9
(1) *General reporting requirements*	
(a) On and after the date specified in Section 33(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code R. 335-3-16-.05(c)3.	
(b) A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code R. 335-3-16-.05(c)3. and the following information, as applicable:	
i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;	
ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and	
iii. A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.	
(2) General recordkeeping requirements.	
(a) The owner or operator shall comply with the recordkeeping requirements specified in ADEM	

Federally Enforceable Provisos	Regulations
Admin. Code R. 335-3-16-.05(c)2.. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). (b) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	
(d) Savings Provisions	40 CFR 64.10
(1) Nothing in this part shall:	
a. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part.	
b. Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable.	
c. Restrict or abrogate the authority of the Department	

General Permit Provisos

Federally Enforceable Provisos	Regulations
to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.	

Summary Page for 40 MW Electric Arc Furnace with Baghouse

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP001	40 MW Electric Submerged Arc Furnace with Baghouse	PM	The greater of 0.99 lb/MW or Process Weight (see general provisos for process weight)	40 CFR Part 60 Subpart Z ADEM Admin. Code R. 335-3-10-.02(26)
EP001	40 MW Electric Submerged Arc Furnace	PM	22.7 lb/hr	40 CFR Part § 64.3(b)(4)(i)
EP001	40 MW Electric Submerged Arc Furnace	NO_X	N/A	N/A
EP001	40 MW Electric Submerged Arc Furnace	SO2	N/A	N/A
EP001	40 MW Electric Submerged Arc Furnace	VOC	N/A	N/A
EP001	40 MW Electric Submerged Arc Furnace	HAPs	5% VE at Main Baghouse and 20% Opacity at Furnace Building with maximum 60% opacity of 6 minunte average	40 CFR Part 63 Subpart YYYYYY [§ 63.11526(a) & (b)]
EP001	40 MW Electric Submerged Arc Furnace	Opacity	(see general provisos)	SIP
EP001	Fugitives from Furnace Building	PM	N/A	N/A

Provisos for 40 MW Electric Arc Furnace with Baghouse

Federally Enforceable Provisos	Regulations
Applicability	
1. These units are subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "*Major Source Operating Permits*".	ADEM Admin. Code R. 335-3-16-.03
2. This source is subject only to the Particulate Matter emission rate limitation (0.99 lb/MW) of 40 CFR Part 60 Subpart Z, "Standards of Performance for Ferroalloy Production Facilities".	40 CFR Part 60 Subpart Z ADEM Admin. Code R. 335-3-10-.02(26)
3. This source is subject to ADEM Admin. Code R. 335-3-4-.01(1), "Control of Particulate Emissions – Visible Emissions"	ADEM Admin. Code R. 335-3-4-.01(1)
4. This source is subject to the applicable requirements of 40 CFR Part 63 Subpart YYYYYY "Area Source NESHAP for Ferroalloys Production Facilities".	40 CFR Part 63 Subpart YYYYYY [§ 63.11524]
5. This source is subject to the applicable requirements of 40 CFR Part 63 Subpart A "General Provisions". As listed in Table 1 in Subpart YYYYYY in 40 CFR Part 63.	40 CFR Part 63 Subpart YYYYYY [§ 63.11530]
6. This source is subject to the applicable requirements of 40 CFR Part 64 "Compliance Assurance Monitoring". Pre-control potential particulate matter emissions exceed 100 TPY.	40 CFR Part 64
Emission Standards	
1. Particulate matter emissions from the stacks associated with the electric arc furnace and baghouse shall not exceed the greater of 0.99 lb per Megawatt hr or the allowable as set by Rule 335-3-4-.04.	40 CFR Part 60 Subpart Z ADEM Admin Rule 335-3-10-.02(26)
2. To prevent this unit from being required to collect four or more data values as required by 40 CFR Part § 64.3(b)(4)(i), particulate matter emissions associated with the electric arc furnace and baghouse shall not exceed the requested limit of 22.7 lb/hr.	40 CFR Part § 64.3(b)(4)(i)
3. Visible Emissions (VE) by Method 22 of the Main Baghouse Exhaust must not exceed 5% of accumulated occurrences in a 60-minute observation period and Opacity readings of the Furnace Building by Method 9 must not exceed 20% during any 6-minute average, except for one 6-minute average per hour may reach 60%.	40 CFR Part 63 Subpart YYYYYY [§ 63.11526(a) & (b)]
Compliance and Performance Test Methods and Procedures	
1. Method 5D of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-1-.04

Federally Enforceable Provisos	Regulations
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin Code R. 335-3-1-.04
3. The performance tests conducted to demonstrate compliance with visual emissions limit and furnace building fugitive emissions in §63.11526 shall conform to the test methods and procedures specified in §63.11528 (a), (b)(1-2), (c) (1-3).	40 CFR Part 63 Subpart YYYYYY [§ 63.11528(a), (b)(1-2), (c) (1-3)]
Emission Monitoring	
1. The Permittee shall perform the following inspections of the main baghouse to verify proper operation. The following activities shall be performed: (1) Once per day perform a visual check of the baghouse ridge vent. (2) Once per week check hopper, fan and cleaning cycle for proper operation. (3) Once per week a visual check of all hoods and ductwork. (4) Record any repairs or observed problems.	ADEM Admin. Code R. 335-3-16-.05(c)(1)
2. The Permittee shall perform the following inspections of the main baghouse to verify proper operation. The following activities shall be performed: (1) Internal inspection of structure, access doors and bags during major outages which occur at approximately 12 to 18 months intervals. (2) Annual external inspection of all hoppers.	ADEM Admin. Code R. 335-3-16-.05(c)(1)
3. The facility must perform a visual determination of fugitive emissions once per day, on each day the process is in operation, during the operation of the process.	40 CFR Part 63 Subpart YYYYYY [§ 63.11257(a)(1)(i)]
4. The facility may decrease the frequency of visual monitoring to once per calendar week of time the process is in operation, during operation of the process if no fugitive emissions are detected in consecutive daily visual monitoring performed in accordance with § 63.11257(a)(1)(i) for 90 days of operation of the process.	40 CFR Part 63 Subpart YYYYYY [§ 63.11257(a)(1)(ii)]
5. The facility must conduct a Method 22 test for at least sixty (60) minutes at the main baghouse exhaust within twenty-four (24) hours of determining the presence of any visible emissions.	40 CFR Part 63 Subpart YYYYYY [§ 63.11257(a)(2]]
6. Particulate Matter emission monitoring requirements under 40 CFR Part 64, “Compliance Assurance Monitoring” can be found in Appendix A.	40 CFR Part 64 – CAM

Federally Enforceable Provisos	Regulations
Recordkeeping and Reporting Requirements	
1. The Permittee shall provide a written report (by letter, fax, or email) to the Department, by the 10th day of each month, showing all periods when the furnace baghouse was not in operation during the preceding month. For each period the baghouse was not in operation, the report will describe or show the following: (1) The time the furnace was not in operation. (2) The time the baghouse was not in operation. (3) The baghouse down time that was in excess of the furnace down time. (4) The reason(s) the furnace and/or baghouse were not in operation (5) The total of the excess baghouse down time as a percentage of the furnace monthly operating time.	Administrative Order No. 88-072-AP
2. The Permittee shall maintain a record of all inspections performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	ADEM Admin Code R. 335-3-16-.05(c)(2)
3. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" to include the Reporting and Recordkeeping Requirements in §64.9.	40 CFR Part 64 – CAM
4. The Permittee shall record the baghouse pressure and inlet temperature hourly. Also, a record shall be kept of instances that the pressure and/or inlet temperature exceed the action levels (12 inches of water and 450°F, respectively) and the corrective action taken. Any deviations from the pressure or inlet temperature limits (outside the 1 to 16 inch range or above 500 °F) shall be documented along with corrective action and reported to the Department within two (2) working days. Each record shall be maintained for a period of 5 years.	40 CFR Part 64 – CAM
5. This source shall comply with the notification requirements specified in § 63.11259(a) & (b).	40 CFR Part 63 Subpart YYYYYY [§63.11259(a) & (b)]
6. The facility must meet the following Annual Compliance Certification reporting requirements: (a) Results of daily or weekly visual monitoring events at the main baghouse exhaust. (b) Results of the follow up Method 22 tests that are required if visible emissions are observed during daily	40 CFR Part 63 Subpart YYYYYY [§63.11259(c)]

Federally Enforceable Provisos	Regulations
or weekly visual monitoring at the main baghouse exhaust.	
(c) Results of Method 22 tests or Method 9 tests required at the main baghouse exhaust and fugitive emissions at the furnace building.	
7. This source shall comply with the recordkeeping requirements specified in § 63.11259(d) & (e).	40 CFR Part 63 Subpart YYYYYY [§63.11259(d) & (e)]
(a) The facility must keep the records of all daily or weekly visual Method 22 and Method 9 monitoring data required by § 63.11257 and the following information.	40 CFR Part 63 Subpart YYYYYY [§63.11259(d)]
(b) The facility must keep the records of all daily or weekly visual Method 22 and Method 9 monitoring data required by §63.11257 and the following information.	40 CFR Part 63 Subpart YYYYYY [§63.11259(e)]
1. The date, place, and time of the monitoring event.	
2. Person conducting the monitoring.	
3. Technique or method used.	
4. Operating conditions during the activity; and	
5. Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that the monitoring indicated proper operation.	
8. As specified in 40 CFR § 63.10(b)(1), the facility must keep each record for 5 years following the date of each recorded action.	40 CFR Part 63 Subpart YYYYYY [§63.11259(f)
9. The facility must keep each record onsite for at least 2 years after the date of each recorded action according to §63.10(b)(1). The facility may keep the records offsite for the remaining 3 years.	40 CFR Part 63 Subpart YYYYYY [§63.11259(g)

Summary Page for Dump Hopper

Permitted Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP002	Dump Hopper with Baghouse	PM	Lesser of $E = 3.59 (P)^{0.62}$ or 22.7 lb/hr	ADEM Admin Code R. 335.3.4-.04 or 40 CFR Part 64
EP002	Dump Hopper with Baghouse	Opacity	(see general provisos)	SIP

Provisos for Dump Hopper

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-16-.03
2. This source is subject to the applicable requirements of 40 CFR Part 64 "Compliance Assurance Monitoring". Pre-control potential particulate matter emissions exceed 100 TPY.	40 CFR Part 64
3. This source is subject to ADEM Admin. Code R. 335-3-4-.01(1), "Control of Particulate Emissions – Visible Emissions"	ADEM Admin. Code R. 335-3-4-.01(1)
Emission Standards	
1. Particulate matter emissions from this unit shall not exceed the lesser of that which is calculated using the process weight equation as defined in ADEM Admin. Code R. 335-3-4-.04(1), or the requested PM limit of 22.7 lb/hr.	ADEM Admin. Code R. 335-3-4-.01(1) or 40 CFR Part § 64.3(b)(4)(ii)
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-1-.04
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin. Code R. 335-3-1-.05
Emission Monitoring	
1. The Permittee shall perform the following inspections of the baghouse to verify proper operation.	ADEM Admin. Code R. 335-3-16-.05(c)(1)
The following activities shall be performed: (1) Once per week perform a visual check of the baghouse stack. (2) Once per month check hopper, fan and cleaning cycle for proper operation. (3) Once per month a visual check of all hoods and ductwork. (4) Record any repairs or observed problems.	ADEM Admin. Code R. 335-3-1-.04

Federally Enforceable Provisos	Regulations
2. The Permittee shall perform the following annual inspections of the baghouse to verify proper operation. The following activities shall be performed: (1) Internal inspection of structure, access doors and bags. (2) External inspection of all hoppers.	ADEM Admin. Code R. 335-3-16-.05(c)(1)
3. Particulate Matter emission monitoring requirements under 40 CFR Part 64, "Compliance Assurance Monitoring" can be found in Appendix A.	40 CFR Part 64 – CAM
Recordkeeping and Reporting Requirements	
1. The source shall maintain a record of all inspections performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	ADEM Admin. Code R. Rule 335-3-16-.05(c)(2)
2. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" to include the Reporting and Recordkeeping Requirements in §64.9.	40 CFR Part 64 - CAM
3. The Permittee shall record the baghouse pressure daily. Any deviations from the pressure range shall be documented along with the corrective action and reported to the Department within two (2) working days. Each record shall be maintained for a period of 5 years.	40 CFR PART 64 - CAM

Summary Page for Primary Crushing and Screening

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP003	Primary Crushing and Screening with Baghouse	PM	Lesser of E = 3.59 $(P)^{0.62}$ or 22.7 lb/hr	ADEM Admin Code R. 335.3.4-.04 or 40 CFR Part 64
EP003	Primary Crushing and Screening with Baghouse	Opacity	(see general provisos)	SIP

Provisos for Primary Crushing and Screening

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits".	ADEM Admin. Code R. 335-3-16-.03
2. This source is subject to the applicable requirements of 40 CFR Part 64 "Compliance Assurance Monitoring". Pre-control potential particulate matter emissions exceed 100 TPY.	40 CFR Part 64
3. This source is subject to ADEM Admin. Code R. 335-3-4-.01(1), "Control of Particulate Emissions – Visible Emissions"	ADEM Admin. Code R. 335-3-4-.01(1)
Emission Standards	
1. Particulate matter emissions from this unit shall not exceed the lesser of that which is calculated using the process weight equation as defined in ADEM Admin. Code R. 335-3-4-.04(1), or the requested PM limit of 22.7 lb/hr.	ADEM Admin. Code R. 335-3-4-.01(1) or 40 CFR Part § 64.3(b)(4)(ii)
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-1-.04
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin. Code R. 335-3-1-.05
Emission Monitoring	ADEM Admin. Code R. 335-3-16-.05(c)(1)
1. The Permittee shall perform the following inspections of the baghouse to verify proper operation.	ADEM Admin. Code R. 335-3-16-.05(c)(1)
The following activities shall be performed: (1) Once per week perform a visual check of the baghouse stack. (2) Once per month check hopper, fan and cleaning cycle for proper operation. (3) Once per month a visual check of all hoods and ductwork. (4) Record any repairs or observed problems.	ADEM Admin. Code R. 335-3-1-.04
2. The Permittee shall perform the following annual inspections of the baghouse to verify proper operation.	ADEM Admin. Code R. 335-3-16-.05(c)(1)

Federally Enforceable Provisos	Regulations
The following activities shall be performed: (1) Internal inspection of structure, access doors and bags. (2) External inspection of all hoppers.	
3. Particulate Matter emission monitoring requirements under 40 CFR Part 64, “Compliance Assurance Monitoring” can be found in Appendix A.	40 CFR Part 64 – CAM
Recordkeeping and Reporting Requirements	
1. The source shall maintain a record of all inspections performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	ADEM Admin. Code R. Rule 335-3-16-.05(c)(2)
2. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" to include the Reporting and Recordkeeping Requirements in §64.9.	40 CFR Part 64 - CAM
3. The Permittee shall record the baghouse pressure daily. Any deviations from the pressure range shall be documented along with the corrective action and reported to the Department within two (2) working days. Each record shall be maintained for a period of 5 years.	40 CFR PART 64 - CAM

Summary Page for Secondary Crushing and Screening

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP004	Secondary Crushing and Screening with Baghouse	PM	Lesser of E = 3.59 $(P)^{0.62}$ or 22.7 lb/hr	ADEM Admin Code R. 335.3.4-.04 or 40 CFR Part 64
EP004	Secondary Crushing and Screening with Baghouse	Opacity	(see general provisos)	SIP

Provisos for Secondary Crushing and Screening

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "*Major Source Operating Permits*".	ADEM Admin. Code R. 335-3-16-.03
2. This source is subject to the applicable requirements of 40 CFR Part 64 "Compliance Assurance Monitoring". Pre-control potential particulate matter emissions exceed 100 TPY.	40 CFR Part 64
3. This source is subject to ADEM Admin. Code R. 335-3-4-.01(1), "Control of Particulate Emissions – Visible Emissions"	ADEM Admin. Code R. 335-3-4-.01(1)
Emission Standards	
1. Particulate matter emissions from this unit shall not exceed the lesser of that which is calculated using the process weight equation as defined in ADEM Admin. Code R. 335-3-4-.04(1), or the requested PM limit of 22.7 lb/hr.	ADEM Admin. Code R. 335-3-4-.01(1) or 40 CFR Part § 64.3(b)(4)(ii)
Compliance and Performance Test Methods and Procedures	
1. Method 5 of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-1-.04
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin. Code R. 335-3-1-.05
Emission Monitoring	ADEM Admin. Code R. 335-3-16-.05(c)(1)
1. The Permittee shall perform the following inspections of the baghouse to verify proper operation.	ADEM Admin. Code R. 335-3-16-.05(c)(1)
The following activities shall be performed: (1) Once per week perform a visual check of the baghouse stack. (2) Once per month check hopper, fan and cleaning cycle for proper operation. (3) Once per month a visual check of all hoods and ductwork. (4) Record any repairs or observed problems.	ADEM Admin. Code R. 335-3-1-.04

Federally Enforceable Provisos	Regulations
2. The Permittee shall perform the following annual inspections of the baghouse to verify proper operation. The following activities shall be performed: (1) Internal inspection of structure, access doors and bags. (2) External inspection of all hoppers.	ADEM Admin. Code R. 335-3-16-.05(c)(1)
3. Particulate Matter emission monitoring requirements under 40 CFR Part 64, "Compliance Assurance Monitoring" can be found in Appendix A.	40 CFR Part 64 – CAM
Recordkeeping and Reporting Requirements	
1. The source shall maintain a record of all inspections performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	ADEM Admin. Code R. Rule 335-3-16-.05(c)(2)
2. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" to include the Reporting and Recordkeeping Requirements in §64.9.	40 CFR Part 64 - CAM
3. The Permittee shall record the baghouse pressure daily. Any deviations from the pressure range shall be documented along with the corrective action and reported to the Department within two (2) working days. Each record shall be maintained for a period of 5 years.	40 CFR PART 64 - CAM

Summary Page for Crushing and Sizing System

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP005	Crushing and Sizing System with Baghouse	PM	*	SIP
EP005	Crushing and Sizing System with Baghouse	PM	5.7 lb/hr	Anti-PSD
EP005	Crushing and Sizing System with Baghouse	Opacity	(see general provisos)	SIP

* $E = 3.59 (P)^{0.62}$ (P less than 30 tons per hour)
$E = 17.31 (P)^{0.16}$ (P greater than 30 tons per hour)
Where E = Emissions in pounds per hour

P = Process weight per hour in tons per hour

Provisos for Crushing and Sizing System

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "*Major Source Operating Permits*".	ADEM Admin. Code R. 335-3-16-.03
2. This source is subject to the applicable requirements of 40 CFR Part 64 "Compliance Assurance Monitoring". Pre-control potential particulate matter emissions exceed 100 TPY.	40 CFR Part 64
3. This source is subject to ADEM Admin. Code R. 335-3-4-.01(1), "Control of Particulate Emissions – Visible Emissions"	ADEM Admin. Code R. 335-3-4-.01(1)
4. This source has enforceable limits in place in order to comply with the applicable provisions of ADEM Admin. Code R. 335-3-14-.04. "Air Permits Authorizing Construction in Clean Air Areas [Preventions of Significant Deterioration]".	ADEM Admin. Code R. 335-3-4-.01(1)
Emission Standards	
1. Particulate emissions from this unit shall not exceed 5.7 lbs/hr and 24.9 tons/year.	ADEM Admin. Code R. 335-3-14-.04
Compliance and Performance Test Methods and Procedures	
3. Method 5 of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin. Code R. 335-3-1-.04
4. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	ADEM Admin. Code R. 335-3-1-.05
Emission Monitoring	ADEM Admin. Code R. 335-3-16-.05(c)(1)
1. The Permittee shall perform the following inspections of the baghouse to verify proper operation.	ADEM Admin. Code R. 335-3-16-.05(c)(1)
The following activities shall be performed: (1) Once per week perform a visual check of the baghouse stack. (2) Once per month check hopper, fan and cleaning cycle for proper operation. (3) Once per month a visual check of all hoods and ductwork. (4) Record any repairs or observed problems.	ADEM Admin. Code R. 335-3-1-.04

Federally Enforceable Provisos	Regulations
2. The Permittee shall perform the following annual inspections of the baghouse to verify proper operation. The following activities shall be performed: (1) Internal inspection of structure, access doors and bags. (2) External inspection of all hoppers.	ADEM Admin. Code R. 335-3-16-.05(c)(1)
3. Particulate Matter emission monitoring requirements under 40 CFR Part 64, "Compliance Assurance Monitoring" can be found in Appendix A.	40 CFR Part 64 – CAM
Recordkeeping and Reporting Requirements	
1. The source shall maintain a record of all inspections performed to satisfy the requirements of periodic monitoring. This shall include all problems observed and corrective actions taken. Each record shall be maintained for a period of 5 years.	ADEM Admin. Code R. Rule 335-3-16-.05(c)(2)
2. This source is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring" to include the Reporting and Recordkeeping Requirements in §64.9.	40 CFR Part 64 - CAM
3. The Permittee shall record the baghouse pressure daily. Any deviations from the pressure range shall be documented along with the corrective action and reported to the Department within two (2) working days. Each record shall be maintained for a period of 5 years.	40 CFR PART 64 - CAM

Summary Page for Silfume Handling, Transport, and Storage

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP006	Three Silfume Silos, Pneumatic Conveyors with Bin Vent Filters	PM	*	SIP
EP006	Three Silfume Silos, Pneumatic Conveyors with Bin Vent Filters	Opacity	(see general provisos)	SIP

* $E = 3.59 (P)^{0.62}$ (P less than 30 tons per hour)
$E = 17.31 (P)^{0.16}$ (P greater than 30 tons per hour)
Where E = Emissions in pounds per hour
P = Process weight per hour in tons per hour

Provisos for Silfume Handling, Transport, and Storage

Federally Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-16-.03, "Major Source Operating Permits."	ADEM Admin Code R. 335-3-16-.03
2. This source is subject to the applicable requirements of ADEM Admin. Code R. 335-3-4-.02, "Fugitive Dust and Fugitive Emissions".	ADEM Admin Code R. 335-3-4-.02
Emission Standards	N/A
1. This Source is subject to no additional specific requirements other than those listed in the General Permit Provisos.	
Compliance and Performance Test Methods and Procedures	ADEM Admin Code R. 335-3-1-.04
1. Method 5 of 40 CFR (Latest Edition) Part 60, Appendix A, or an equivalent method as approved by the Department shall be used in the determination of particulate emissions from the stack.	ADEM Admin Code R. 335-3-1-.04
2. Method 9 of 40 CFR (Latest Edition) Part 60, Appendix A shall be used in the determination of the opacity of the stack emissions.	
Emission Monitoring	N/A
1. This Source is subject to no additional specific requirements other than those listed in the General Permit Provisos.	
Recordkeeping and Reporting Requirements	N/A
1. This Source is subject to no additional specific requirements other than those listed in the General Permit Provisos.	N/A

APPENDIX A

40 CFR 64

Compliance Assurance Monitoring (CAM)

MONITORING APPROACH: 40 MW Submerged Electric Arc Furnace

I. Indicator	Pressure Drop	Visible Emission	Visual Inspections
Measurement Approach	Pressure drop across the baghouse will be monitored once each operating day utilizing an inlet pressure gauge.	Visible emissions will be monitored each operating day using qualitative observations of the appropriate vent.	The facility will visually inspect the hopper, fan, cleaning cycle, hoods, and ductwork once per week. The structure, access doors, bags, and hoppers will have an internal inspection during each major outage, which occur at approximately 18 month intervals.
II. Indicator Range	An excursion will be defined as a pressure drop outside the range of 1 to 16 inches of water column. An excursion triggers an investigation into the cause and the appropriate corrective action will be performed and documented.	An excursion is defined as the presence of abnormal visible emissions. An excursion triggers an investigation into the cause and the appropriate corrective action will be performed and documented.	An excursion will be defined as a missed weekly inspection or the failure to perform an internal inspection during a major outage, which occur approximately every 18-months.
III. Performance Criteria A. Data Representativeness	The inlet pressure gauge has been properly situated to measure inlet air pressure to the device.	Observations will be taken at the exhaust outlet where the filtered air is introduced to the atmosphere.	These periodic inspections will identify system problems, which must be corrected to ensure proper operation.
B. Verification of Operation Status	Monitoring will only occur on those days when the furnace and baghouse are operational.	Monitoring will only occur on those days when the furnace and baghouse are operational.	N/A
C. QA/QC Practices and Criteria	The inlet pressure gauge will be tested and calibrated as required and in accordance with manufacturer's written instructions.	The observer will receive on the-job training, which will acclimate the observer to what constitutes normal/abnormal readings.	N/A

D. Monitoring Frequency	The observation will be recorded on at least 90% of the operating days in a six-month period.	The observation will be recorded on at least 90% of the operating days in a six-month period.	At approximately 18 month intervals.
Data Collection Procedures	The observation will be documented by the observer.	The observation will be documented by the observer.	The observer will document the results of each inspection.
Averaging period	N/A	N/A	N/A

MONITORING APPROACH: Dump Hopper

I. Indicator	Pressure Drop	Visible Emission	Visual Inspections
Measurement Approach	Pressure drop across the baghouse will be monitored once each operating day utilizing an inlet pressure gauge.	Visible emissions will be monitored each operating day using qualitative observations of the appropriate vent.	The facility will visually inspect the hopper, fan, cleaning cycle, hoods, and ductwork once per month. The structure, access doors, bags, and hoppers will have an internal inspection annually.
II. Indicator Range	An excursion will be defined as a pressure drop outside the range of 1 to 14 inches of water column. An excursion triggers an investigation into the cause and the appropriate corrective action will be performed and documented.	An excursion is defined as the presence of abnormal visible emissions. An excursion triggers an investigation into the cause and the appropriate corrective action will be performed and documented.	An excursion will be defined as a missed monthly inspection or greater than a 12-month period between internal inspections.
III. Performance Criteria A. Data Representativeness	The inlet pressure gauge has been properly situated to measure inlet air pressure to the device.	Observations will be taken at the exhaust outlet where the filtered air is introduced to the atmosphere.	These periodic inspections will identify system problems, which must be corrected to ensure proper operation.
B. Verification of Operation Status	Monitoring will only occur on those days when the furnace and baghouse are operational.	Monitoring will only occur on those days when the furnace and baghouse are operational.	N/A
C. QA/QC Practices and Criteria	The inlet pressure gauge will be tested and calibrated as required and in accordance with manufacturer's written instructions.	The observer will receive on the-job training, which will acclimate the observer to what constitutes normal/abnormal readings.	N/A
D. Monitoring Frequency	The observation will be recorded on at least 90% of the operating days in a six-month period.	The observation will be recorded on at least 90% of the operating days in a six-month period.	Monthly or Annually, as noted.

Data Collection Procedures	The observation will be documented by the observer.	The observation will be documented by the observer.	The observer will document the results of each inspection.
Averaging period	N/A	N/A	N/A

MONITORING APPROACH: Primary Screening and Crushing

I. Indicator	Pressure Drop	Visible Emission	Visual Inspections
Measurement Approach	Pressure drop across the baghouse will be monitored once each operating day utilizing an inlet pressure gauge.	Visible emissions will be monitored each operating day using qualitative observations of the appropriate vent.	The facility will visually inspect the hopper, fan, cleaning cycle, hoods, and ductwork once per month. The structure, access doors, bags, and hoppers will have an internal inspection annually.
II. Indicator Range	An excursion will be defined as a pressure drop outside the range of 1 to 14 inches of water column. An excursion triggers an investigation into the cause and the appropriate corrective action will be performed and documented.	An excursion is defined as the presence of abnormal visible emissions. An excursion triggers an investigation into the cause and the appropriate corrective action will be performed and documented.	An excursion will be defined as a missed monthly inspection or greater than a 12-month period between internal inspections.
III. Performance Criteria A. Data Representativeness	The inlet pressure gauge has been properly situated to measure inlet air pressure to the device.	Observations will be taken at the exhaust outlet where the filtered air is introduced to the atmosphere.	These periodic inspections will identify system problems, which must be corrected to ensure proper operation.
B. Verification of Operation Status	Monitoring will only occur on those days when the furnace and baghouse are operational.	Monitoring will only occur on those days when the furnace and baghouse are operational.	N/A
C. QA/QC Practices and Criteria	The inlet pressure gauge will be tested and calibrated as required and in accordance with manufacturer's written instructions.	The observer will receive on the-job training, which will acclimate the observer to what constitutes normal/abnormal readings.	N/A
D. Monitoring Frequency	The observation will be recorded on at least 90% of the operating days in a six-month period.	The observation will be recorded on at least 90% of the operating days in a six-month period.	Monthly or Annually, as noted.

Data Collection Procedures	The observation will be documented by the observer.	The observation will be documented by the observer.	The observer will document the results of each inspection.
Averaging period	N/A	N/A	N/A

MONITORING APPROACH: Secondary Screening and Crushing

I. Indicator	Pressure Drop	Visible Emission	Visual Inspections
Measurement Approach	Pressure drop across the baghouse will be monitored once each operating day utilizing an inlet pressure gauge.	Visible emissions will be monitored each operating day using qualitative observations of the appropriate vent.	The facility will visually inspect the hopper, fan, cleaning cycle, hoods, and ductwork once per month. The structure, access doors, bags, and hoppers will have an internal inspection annually.
II. Indicator Range	An excursion will be defined as a pressure drop outside the range of 1 to 14 inches of water column. An excursion triggers an investigation into the cause and the appropriate corrective action will be performed and documented.	An excursion is defined as the presence of abnormal visible emissions. An excursion triggers an investigation into the cause and the appropriate corrective action will be performed and documented.	An excursion will be defined as a missed monthly inspection or greater than a 12-month period between internal inspections.
III. Performance Criteria A. Data Representativeness	The inlet pressure gauge has been properly situated to measure inlet air pressure to the device.	Observations will be taken at the exhaust outlet where the filtered air is introduced to the atmosphere.	These periodic inspections will identify system problems, which must be corrected to ensure proper operation.
B. Verification of Operation Status	Monitoring will only occur on those days when the furnace and baghouse are operational.	Monitoring will only occur on those days when the furnace and baghouse are operational.	N/A
C. QA/QC Practices and Criteria	The inlet pressure gauge will be tested and calibrated as required and in accordance with manufacturer's written instructions.	The observer will receive on the-job training, which will acclimate the observer to what constitutes normal/abnormal readings.	N/A
D. Monitoring Frequency	The observation will be recorded on at least 90% of the operating days in a six-month period.	The observation will be recorded on at least 90% of the operating days in a six-month period.	Monthly or Annually, as noted.

Data Collection Procedures	The observation will be documented by the observer.	The observation will be documented by the observer.	The observer will document the results of each inspection.
Averaging period	N/A	N/A	N/A

MONITORING APPROACH: Crushing and Sizing

I. Indicator	Pressure Drop	Visible Emission	Visual Inspections
Measurement Approach	Pressure drop across the baghouse will be monitored once each operating day utilizing an inlet pressure gauge.	Visible emissions will be monitored each operating day using qualitative observations of the appropriate vent.	The facility will visually inspect the hopper, fan, cleaning cycle, hoods, and ductwork once per month. The structure, access doors, bags, and hoppers will have an internal inspection annually.
II. Indicator Range	An excursion will be defined as a pressure drop outside the range of 1 to 14 inches of water column. An excursion triggers an investigation into the cause and the appropriate corrective action will be performed and documented.	An excursion is defined as the presence of abnormal visible emissions. An excursion triggers an investigation into the cause and the appropriate corrective action will be performed and documented.	An excursion will be defined as a missed monthly inspection or greater than a 12-month period between internal inspections.
III. Performance Criteria A. Data Representativeness	The inlet pressure gauge has been properly situated to measure inlet air pressure to the device.	Observations will be taken at the exhaust outlet where the filtered air is introduced to the atmosphere.	These periodic inspections will identify system problems, which must be corrected to ensure proper operation.
B. Verification of Operation Status	Monitoring will only occur on those days when the furnace and baghouse are operational.	Monitoring will only occur on those days when the furnace and baghouse are operational.	N/A
C. QA/QC Practices and Criteria	The inlet pressure gauge will be tested and calibrated as required and in accordance with manufacturer's written instructions.	The observer will receive on the-job training, which will acclimate the observer to what constitutes normal/abnormal readings.	N/A
D. Monitoring Frequency	The observation will be recorded on at least 90% of the operating days in a six-month period.	The observation will be recorded on at least 90% of the operating days in a six-month period.	Monthly or Annually, as noted.

Data Collection Procedures	The observation will be documented by the observer.	The observation will be documented by the observer.	The observer will document the results of each inspection.
Averaging period	N/A	N/A	N/A